

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	<u>SUPERSEDING INDICTMENT</u>
)	
CALVIN MARK WILSON)	NO. 4:17-CR-00053-BO-1
a/k/a "Bali")	
MARIO CORRELLUS BARGNEARE)	NO. 4:17-CR-00053-BO-2
a/k/a "Rio")	
WILLIE FRANK JAMES AHERN)	NO. 4:17-CR-00053-BO-3
a/k/a "White," "White)	
Bread," "Dribs")	
DEREK JACQUAN WIGGINS)	NO. 4:17-CR-00053-BO-4
a/k/a "DJ")	
ROY JAMES NOLON)	NO. 4:17-CR-00053-BO-5
a/k/a "Henny")	
MICHAEL QUALEEK VELASQUEZ,)	NO. 4:17-CR-00053-BO-6
a/k/a "Moo Moo")	
LAMAR HOSEA WIGGINS)	NO. 4:17-CR-00053-BO-7
a/k/a "LB")	
LASHAWNNA JAQUETTE MCCOTTER,)	NO. 4:17-CR-00053-BO-8
a/k/a "Flossy")	
LATREKA DENISE HARDESTY)	NO. 4:17-CR-00053-BO-9
a/k/a "T")	

The Grand Jury charges that:

COUNT ONE

Beginning at a date unknown to the Grand Jury, but no later than in or around April 2015, and continuing until on or about October 24, 2017, in the Eastern District of North Carolina and elsewhere, the defendants, CALVIN MARK WILSON, also known as "Bali," MARIO CORRELLUS BARGNEARE, also known as "Rio," WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," DEREK JACQUAN WIGGINS, also known as "DJ," ROY JAMES

NOLON, also known as "Henny," MICHAEL QUALEEK VELASQUEZ, also known as "Moo Moo," LAMAR HOSEA WIGGINS, also known as "LB," LASHAWNNA JAQUETTE MCCOTTER, also known as "Flossy," and LATREKA DENISE HARDESTY, also known as "T," did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute marijuana and a mixture and substance containing a detectable amount of heroin, both Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to the defendants, CALVIN MARK WILSON, also known as "Bali," and MARIO CORRELLUS BARGNEARE, also known as "Rio," the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(b)(1)(B) and 841(b)(1)(C).

With respect to the defendants, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," DEREK JACQUAN WIGGINS, also known as "DJ," ROY JAMES NOLON, also known as "Henny," MICHAEL QUALEEK VELASQUEZ, also known as "Moo Moo," LAMAR

HOSEA WIGGINS, also known as "LB," LASHAWNNA JAQUETTE MCCOTTER, also known as "Flossy," and LATREKA DENISE HARDESTY, also known as "T," the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a quantity of marijuana and a quantity of a mixture and substance containing a detectable amount of heroin, both Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Beginning at a date unknown to the Grand Jury, but no later than in or around April 2015, and continuing until the date of Indictment, in the Eastern District of North Carolina and elsewhere, the defendant, CALVIN MARK WILSON, also known as "Bali," did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that he unlawfully, knowingly, and intentionally violated Title 21, United States Code, Sections 841(a)(1), 843, and 846, which violations include but are not limited to the substantive violations alleged in Count One, Narcotics Conspiracy; Counts Five through Eleven, Thirteen through Fifteen, and Seventeen through Thirty, Distribution of Narcotics; and Counts Three, Four, Sixteen, Thirty-One, and Thirty-Five,

Possession with Intent to Distribute Narcotics, which Counts are realleged and incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, *et seq.*, undertaken by defendant, CALVIN MARK WILSON, also known as "Bali," in concert with at least five other persons with respect to whom CALVIN MARK WILSON, also known as "Bali," occupied a position of organizer, supervisor, and any position of management, and from which such continuing series of violations the defendant obtained substantial income and resources.

All in violation of Title 21, United States Code, Section 848(a).

COUNT THREE

On or about April 21, 2015, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about June 20, 2016, in the Eastern District of North Carolina, the defendant, LATREKA DENISE HARDESTY, also known as "T," aiding and abetting another person known to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about October 3, 2016, in the Eastern District of North Carolina, the defendant, ROY JAMES NOLON, also known as "Henny," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

On or about October 5, 2016, in the Eastern District of North Carolina, the defendant, ROY JAMES NOLON, also known as "Henny," aiding and abetting another person known to the Grand Jury, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about November 23, 2016, in the Eastern District of North Carolina, the defendant, LATREKA DENISE HARDESTY, also known as "T," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about November 28, 2016, in the Eastern District of North Carolina, the defendant, ROY JAMES NOLON, also known as "Henny," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

On or about November 28, 2016, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount

of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

On or about December 1, 2016, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

On or about December 7, 2016, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

On or about December 14, 2016, in the Eastern District of North Carolina, the defendant, DEREK JACQUAN WIGGINS, also known as "DJ," having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, a firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT THIRTEEN

On or about January 6, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

On or about January 13, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

On or about January 27, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

On or about February 17, 2017, in the Eastern District of North Carolina, the defendant, MICHAEL QUALEEK VELASQUEZ, also known as "Moo Moo," did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTEEN

On or about February 23, 2017, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

On or about March 1, 2017, in the Eastern District of North Carolina, the defendant, DEREK JACQUAN WIGGINS, also known as "DJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETEEN

On or about March 14, 2017, in the Eastern District of North Carolina, the defendant, DEREK JACQUAN WIGGINS, also known as "DJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

On or about April 7, 2017, in the Eastern District of North Carolina, the defendant, DEREK JACQUAN WIGGINS, also known as "DJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

On or about April 19, 2017, in the Eastern District of North Carolina, the defendant, LAMAR HOSEA WIGGINS, also known as "LB," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-TWO

On or about April 24, 2017, in the Eastern District of North Carolina, the defendant, DEREK JACQUAN WIGGINS, also known as "DJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

On or about May 19, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FOUR

On or about June 8, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FIVE

On or about June 15, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

On or about July 7, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SEVEN

On or about July 28, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-EIGHT

On or about July 31, 2017, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-NINE

On or about August 2, 2017, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

On or about August 3, 2017, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," aiding and abetting another person known to the Grand Jury, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

On or about August 5, 2017, in the Eastern District of North Carolina, the defendant, LAMAR HOSEA WIGGINS, also known as "LB," did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-TWO

On or about August 5, 2017, in the Eastern District of North Carolina, the defendant, LAMAR HOSEA WIGGINS, also known as "LB," having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, a firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT THIRTY-THREE

On or about August 5, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," knowingly possessed a firearm, that at any time had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered and

obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT THIRTY-FOUR

On or about August 16, 2017, in the Eastern District of North Carolina, the defendant, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," aiding and abetting another person known to the Grand Jury, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

On or about September 9, 2017, in the Eastern District of North Carolina, the defendants, CALVIN MARK WILSON, also known as "Bali," MARIO CORRELLUS BARGNEARE, also known as "Rio," and LASHAWNNA JAQUETTE MCCOTTER, also known as "Flossy," aiding and abetting each other, did knowingly and intentionally possess with the intent to distribute a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

On or about October 24, 2017, in the Eastern District of North Carolina, the defendant, CALVIN MARK WILSON, also known as "Bali,"

having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, ammunition, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT THIRTY-SEVEN

On or about October 22, 2017, in the Eastern District of North Carolina, the defendant, MARIO CORRELLUS BARGNEARE, also known as "Rio," did knowingly use and carry a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute and Possess with the Intent to Distribute Heroin and Marijuana as alleged in Count One of this Superseding Indictment, and did discharge said firearm, all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTY-EIGHT

On or about October 24, 2017, in the Eastern District of North Carolina, the defendant, ROY JAMES NOLON, also known as "Henny," did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute and Possess with the Intent to Distribute Heroin and Marijuana in violation of Title 21, United States Code, Section 841(a)(1), as alleged in Count One of this Superseding Indictment, which is

incorporated herein by reference; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

ALLEGATIONS OF PRIOR CONVICTIONS

For purposes of Title 21, United States Code, Sections 841(b) and 851, CALVIN MARK WILSON, also known as "Bali," committed the violations alleged in Counts One, Two, and Thirty-Five after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

For purposes of Title 21, United States Code, Sections 841(b) and 851, WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," "Dribs" committed the violations alleged in Counts One, Three, Seventeen, Twenty-Eight through Thirty, and Thirty-Four after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

For purposes of Title 21, United States Code, Sections 841(b) and 851, DEREK JACQUAN WIGGINS, also known as "DJ," committed the violations alleged in Counts One, Eighteen through Twenty, and Twenty-Two after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

For purposes of Title 21, United States Code, Sections 841(b) and 851, MICHAEL QUALEEK VELASQUEZ, also known as "Moo Moo,"

committed the violations alleged in Counts One and Sixteen after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

For purposes of Title 21, United States Code, Sections 841(b) and 851, LAMAR HOSEA WIGGINS, also known as "LB," committed the violations alleged in Counts One, Twenty-One, and Thirty-One after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

FORFEITURE NOTICE

The defendants are given notice of the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 924(d), made applicable by Title 28, United States Code, Section 2461(c), that all of their interest in all property specified herein is subject to forfeiture.

As a result of the offenses charged in Counts One through Eleven, Thirteen through Thirty-One, Thirty-Four, and Thirty-Five of the Indictment, the defendants, CALVIN MARK WILSON, also known as "Bali," MARIO CORRELLUS BARGNEARE, also known as "Rio," WILLIE FRANK JAMES AHERN, also known as "White," "White Bread," and "Dribs," DEREK JACQUAN WIGGINS, also known as "DJ," ROY JAMES NOLON, also known as "Henny," MICHAEL QUALEEK VELASQUEZ, also known as "Moo Moo," LAMAR HOSEA WIGGINS, also known as "LB," LASHAWNNA JAQUETTE MCCOTTER, also known as "Flossy," and LATREKA DENISE HARDESTY, also known as "T," shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of the said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged, or any property traceable to such property. The property includes, but is not limited to, the gross proceeds of the offenses charged, and:

1. One tract of land with all appurtenances and improvements thereto, legally described in Deed Book 607, Pages 213-215 of the Pamlico County Registry, North Carolina, and having the street address of 383 Park Avenue, Mesic, North Carolina, 28515, titled in the names of Willie Ahern and Candice Credle;
2. A black 2006 Maserati Quattroporte sedan with VIN ZAMCE39A760026580; and
3. \$14,095 in US Currency seized on May 14, 2017.

As a result of the offenses charged in Counts Twelve, Thirty-Two, Thirty-Three, and Thirty-Six through Thirty-Eight of the Indictment, the defendants shall forfeit to the United States the firearms and ammunition involved in the knowing commission of the offenses, that is:

1. A black Smith & Wesson model Bodyguard .380 caliber pistol bearing serial number EAH4895;
2. A black Taurus Millennium G2 9mm handgun bearing serial number TFY66186; and
3. Various ammunition.

If any of the above-described forfeitable property, as a result of any act or omission the defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL:

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE:

1/24/18

ROBERT J. HIGDON, JR.
United States Attorney

Laura S. Howard

BY: LAURA S. HOWARD
Assistant United States Attorney
Criminal Division